

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:
Michael Hines	: Chapter 13
	:
	:
Debtor	: Bankruptcy No. 16-16991-jkf
	:
Movant	: Motion to Avoid Judicial Lien
	:
v.	:
	:
Unifund CCR Partners assignee	:
Citibank Universal Card Services	:
Respondent	:

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Michael Hines, through his attorney, Erik B. Jensen, Esquire Attorney for the Debtor, has filed a Motion to avoid judicial liens on residential real estate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before April 24, 2017 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court
Robert N.C. Nix Building
900 Market Street
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Erik B. Jensen, Esquire
1528 Walnut Street
Suite 1401

Philadelphia, PA 19102

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the **Honorable Jean K. FitzSimon, April 26, 2017 at 9:30 a.m., in Courtroom No. #3 United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.**
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney name in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Respectfully submitted,

Date: 03/30/17

/s/ Erik B. Jensen
Erik B. Jensen, Esquire
1528 Walnut St., Suite 1401
Philadelphia, PA 19102
215-546-4700